

**BRAFF, HARRIS & SUKONECK**  
COUNSELLORS AT LAW

**Keith Harris**

26 COLUMBIA TURNPIKE - SUITE 107  
FLORHAM PARK, NEW JERSEY 07932  
(973) 994-6677  
Facsimile (973) 994-1296

Writer's  
e-mail address  
kharris@bhs-law.com

305 Broadway, 7<sup>th</sup> Floor  
New York, New York 10007  
(212) 599-2085  
Facsimile (212) 822-1479

Mailing address: PO Box 657, Livingston, NJ 07039

April 5, 2024

Via Electronic Filing

Magistrate Jose' R. Almonte  
United States District Court  
US Post Office & Courthouse Bldg.  
2 Federal Square  
Newark, NJ 07101-0999

**Re: Rakib, Christine, v. Value Trans Inc., et al.**  
**Docket No.: 2:23-cv-20899**  
**Our File No.: 853.23327**

Dear Judge Almonte:

This office represents the interest of the defendants with respect to the above matter. On December 19, 2023 the court issued a Pretrial Scheduling Order. That Order provides for discovery demands to be served on or before January 19, 2024 and indicates responses were to be served within thirty days of receipt. Presently the deadline for fact discovery is July 19, 2024.

The plaintiff served discovery demands on this office on December 26, 2023. On December 27, 2023 we provided our clients with those discovery demands along with draft responses. Simultaneously we asked that our clients provide information responsive to certain demands which sought information not in our possession. For reasons which are not clear, we did not hear from our clients with regard to those discovery demands nor were our efforts to contact our clients subsequently successful. We have requested authority from the defendants' insurance carrier to hire an investigator to locate our clients in order to allow us to finalize discovery responses.

We have notified the plaintiff of the foregoing situation and it was agreed that we would notify the court of the issue. It was specifically agreed that an extension of the July 19, 2024 fact discovery deadline should be sought. Our expectation is that our efforts to communicate with our clients will be successful but the process has consumed valuable time and makes it unlikely that the parties can meet the July 19, 2024 fact discovery deadline.

**BRAFF, HARRIS & SUKONECK**  
COUNSELLORS AT LAW

April 5, 2024  
Page -2-

We would thank the court to schedule this matter for a conference to address modifying the deadlines in the December 19, 2023 Pretrial Scheduling Order. We thank the court for its consideration.

Respectfully submitted,

BRAFF, HARRIS & SUKONECK

A handwritten signature in black ink, appearing to read 'KH', with a long, sweeping horizontal stroke extending to the right.

KEITH HARRIS  
A Member of the Firm  
KH:mf

cc: Robert J. Banas, Esq.  
Eichen Crutchlow & Mcelroy, LLP